

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
TYLER DIVISION**

INNOVATIVE AUTOMATION LLC,

Plaintiff,

v.

KOBO, INC.,

Defendant.

Case No. 2:13-cv-1103

JURY TRIAL DEMANDED

INNOVATIVE AUTOMATION'S ANSWER TO KOBO'S COUNTERCLAIMS

Plaintiff Innovative Automation LLC answers the Counterclaims of Kobo, Inc. as follows:

PARTIES

1. Admitted.
2. Admitted.

JURISDICTION AND VENUE

3. Admitted for purposes of this action only.
4. Admitted for purposes of this action only.
5. Admitted for purposes of this action only.

INNOVATIVE AUTOMATION'S ANSWER TO KOBO'S COUNT ONE

6. No response necessary.
7. Admitted.
8. Denied.
9. Admitted.
10. Denied.

INNOVATIVE AUTOMATION'S ANSWER TO KOBO'S COUNT TWO

11. No response necessary.

12. Admitted.

13. Admitted.

14. Denied.

15. Denied.

INNOVATIVE AUTOMATION'S ANSWER TO KOBO'S COUNT THREE

16. No response necessary.

17. Denied.

INNOVATIVE AUTOMATION'S ANSWER TO KOBO'S PRAYER FOR JUDGMENT

Innovative Automation denies that Kobo is entitled to any relief whatsoever, including without limitation, the relief requested in paragraphs A-E of Kobo's Prayer for Judgment.

INNOVATIVE AUTOMATION'S PRAYER FOR RELIEF

Innovative Automation prays for judgment that:

- A. Kobo's Counterclaims be dismissed with prejudice;
- B. Kobo takes nothing by reason of its Counterclaims;
- C. Innovative Automation be awarded its costs and expenses;
- D. This be adjudged an exceptional case and that Innovative Automation be awarded its attorneys' fees in this action pursuant to 35 U.S.C. § 285; and
- E. Innovative Automation be awarded such other further relief as the Court may deem appropriate.

Dated: February 18, 2014

Respectfully submitted,

/s/ Marie A. McCrary /

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